

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

NATIONAL FROZEN FOODS
CORPORATION, a Washington corporation,

Plaintiff,

V.

BERKLEY ASSURANCE COMPANY, an Iowa corporation; AMWINS BROKERAGE OF ILLINOIS, a North Carolina Limited Liability Company; AMWINS BROKERAGE OF ARIZONA, a Delaware Limited Liability Company; and AMWINS GROUP LLC, a Delaware Limited Liability Company,

Defendants.

STIPULATION

The parties, by and through their counsel of record, hereby stipulate and agree to this joint request to the Court to amend the Court's Order Setting Trial Date and Related Dates (Dkt. 35). The reasons justifying the proposed change are as follows:

- The AmWINS defendants were added as parties on November 6, 2017, and are not due to answer or otherwise respond to the First Amended Complaint until January 22,

1 2018. The AmWINS defendants have thus not had an opportunity to participate in
2 discovery.
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- 5 • Discovery between National Frozen Foods and Berkley Assurance Company was
6 modestly delayed while the parties addressed terms of a protective order and while
7 the venue issue was being litigated.
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10 The parties conducted a discovery conference on December 12, 2017, and agreed to
11 submit a joint request to extend existing deadlines roughly six months. The proposed deadlines
12 are set forth in the table below:
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Event	Current Deadline	New Deadline
JURY TRIAL DATE	July 30, 2018	February 4, 2019
Length of Trial	5 days	5 days
Deadline for the AmWins Defendants to serve initial disclosures under FRCP 26(a)(1)	December 30, 2017	January 22, 2018
Deadline for joining additional parties	November 6, 2017	May 14, 2018
Deadline for amending pleadings	November 6, 2017	May 14, 2018
Disclosure of expert testimony under FRCP 26(a)(2)	January 31, 2018	August 8, 2018
Deadline for filing motions related to discovery. Any such motions shall be noted for consideration pursuant to LCR 7(d)(3)	March 2, 2018	September 10, 2018
Discovery completed by	April 2, 2018	October 8, 2018
All dispositive motions must be filed by And noted on the motion calendar no later than the fourth Friday thereafter (see LCR 7(d))	May 1, 2018	November 6, 2018
Mediation per LCR 39.1(c)(3) if requested by the parties, HELD NO LATER THAN	June 15, 2018	December 21, 2018
All motions in limine must be filed by and noted on the motion calendar no later than the THIRD Friday thereafter	July 2, 2018	January 7, 2019
Agreed pretrial order due	July 18, 2018	January 23, 2019

Event	Current Deadline	New Deadline
Pretrial conference to be scheduled by the Court		
Trial briefs, proposed voir dire questions, jury instructions, neutral statement of the case, and trial exhibits due	July 25, 2018	January 30, 2019

DATED this 19th day of December, 2017.

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31 **ORDER**
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33 IT IS SO ORDERED this 20th day of December 2017.
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RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE